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6 *Counsel for Plaintiff*
 7 VIRAL DRM LLC

8
UNITED STATES DISTRICT COURT
 9
NORTHERN DISTRICT OF CALIFORNIA
 10
SAN FRANCISCO DIVISION

11 VIRAL DRM LLC,

12 CASE NO.: 3:24-cv-00731-JSC

13 Plaintiff,

14 v.
**15 DECLARATION OF MATTHEW L. ROLLIN
 IN SUPPORT OF PLAINTIFF'S MOTION
 FOR DEFAULT JUDGMENT AGAINST
 UONG SY THANH**

16 UONG SY THANH,

17 Defendant.

18
 19 I, Matthew L. Rollin, declare and say:

20 1. I am an attorney duly licensed to practice before this Court, and I am counsel for
 21 Plaintiff VIRAL DRM LLC (“Viral DRM”) in the above-captioned matter. I provide this
 22 Declaration in support of Viral DRM’s Motion for Entry of a Final Default Judgment Against
 23 Defendant UONG SY THANH (“Thanh” or “Defendant”). I have personal knowledge of the facts
 24 stated herein, and if called as a witness, I could and would testify competently to the matters set forth
 25 herein.

26 2. Thanh has refused to answer, show up or otherwise respond in this case.
 27 3. Injunctive relief is warranted because Thanh has refused to respond to Counsel or the
 28 Court, and due to its lack of a response, there is a chance it could infringe again in the future.

4. For purposes of setting the post-judgment interest rate under 28 U.S.C. § 1961, the average 1-year constant maturity Treasury yield through August 23, 2024, was 4.36 percent. Attached as **Exhibit 1** is a true and correct copy of a table of current federal interest rates, which I obtained from the Federal Reserve Board's website at <https://www.federalreserve.gov/releases/h15/> (printout of "Treasury Constant Maturities," displaying "1-year Treasury constant maturity"). Also attached at **Exhibit 2** is an explanation of how to obtain the information, from <http://www.uscourts.gov/services-forms/fees/post-judgement-interest-rate>

5. My office caused a copy of Viral DRM's Motion to be emailed to Thanh on August 27, 2024. Viral DRM has served Thanh with its requested damage amount with its counsel's service of this motion on Thanh.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 27, 2024

/s/ Matthew L. Rollin

Matthew L. Rollin